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OLIFF & BERRIDGE, PLC P.O. BOX 19928 ALEXANDRIA, VA 22320			SMITH, PETER J	
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**BEFORE THE BOARD OF PATENT APPEALS  
AND INTERFERENCES**

Application Number: 09/859,425  
Filing Date: May 18, 2001  
Appellant(s): DANG ET AL.

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James A. Oliff  
Randi B. Isaacs  
For Appellant

**EXAMINER'S ANSWER**

This is in response to the appeal brief filed 6/6/2005.

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**(1) *Real Party in Interest***

A statement identifying the real party in interest is contained in the brief.

**(2) *Related Appeals and Interferences***

A statement identifying the related appeals and interferences which will directly affect or be directly affected by or have a bearing on the decision in the pending appeal is contained in the brief.

**(3) *Status of Claims***

The statement of the status of the claims contained in the brief is correct.

**(4) *Status of Amendments After Final***

The appellant's statement of the status of amendments after final rejection contained in the brief is incorrect.

The amendment after final rejection filed on March 4, 2005 has been entered. No Amendment After-Final Rejection was filed on January 4, 2005.

**(5) *Summary of Invention***

The summary of invention contained in the brief is correct.

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**(6) *Grounds of Rejection to be Reviewed on Appeal***

The appellant's statement of the grounds of rejection in the brief is substantially correct. The changes are as follows: The rejection of claim 21 under 35 U.S.C. §101 is dropped by the Examiner in response to the After-Final Amendment filed on March 4, 2005 and entered on appeal by the Examiner in the March 17, 2005 Advisory Action.

**(7) *Claims Appendix***

The copy of the appealed claims contained in the Appendix to the brief is correct.

**(8) *Evidence Relied Upon***

6,421,733 B1	Tso et al.	7-2002
6,073,147	Chan et al.	6-2000

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**(9) *Grounds of Rejection***

The following ground(s) of rejection are applicable to the appealed claims:

***Claim Rejections - 35 USC § 103***

The following is a quotation of 35 U.S.C. 103(a) which forms the basis for all obviousness rejections set forth in this Office action:

(a) A patent may not be obtained though the invention is not identically disclosed or described as set forth in section 102 of this title, if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains. Patentability shall not be negated by the manner in which the invention was made.

**Claims 1-21 are rejected under 35 U.S.C. 103(a) as being unpatentable over Tso et al. (hereinafter "Tso"), US 6,421,733 B1 filed 9/8/1997 in view of Chan et al. (hereinafter "Chan"), US 6,073,147 filed 6/10/1997.**

**Regarding independent claim 1**, Tso teaches a client language storage for storing language information associated with a client and a user in col. 8 lines 41-45. Tso teaches a skeleton determining circuit for determining at least one skeleton content elements of a received content portion in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The parser determines which elements need to be dynamically transcoded. Tso teaches a language storage table for storing at least one translation of each of at least one skeleton content elements based on the skeleton content element and a language in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The parser identifies content elements requiring transcoding. Tso teaches in col. 8 lines 41-50 that the elements may be dynamically transcoded from one language to client or user's preferred language. The translation of the elements must be performed by some form of table to match the foreign language elements to the corresponding native language text elements.

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Tso teaches a client and user determining circuit for determining a client and a user associated with a content portion in col. 8 lines 41-45. Tso teaches a merging circuit for merging at least one skeleton content elements based on the language associated with the determined client into the received content portion in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The parser identifies which content elements need to be dynamically transcoded and replaces the identified content elements with the appropriate translation. Content elements which do not require a translation, such as a graphic element, are maintained by the parser and recombined with the translated elements forming a merging of the translation into the content portion.

Tso does not teach wherein the at least one skeleton content elements include graphical content elements and textual content elements. Chan does teach a server maintaining both graphical content and textual content elements in col. 3 lines 36-45. The font server of Chan maintains both a bit-mapped and outline version of each character which respectively are graphic and text content versions. Chan teaches in fig. 3 and col. 4 lines 10-29 that a graphic glyph is transmitted to client computer for font characters which the client computer cannot display. Chan teaches in col. 6 lines 15-35 that Chan is well suited for displaying fonts of languages other than those for which a particular computer is configured. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Tso and Chan to have created the claimed invention. It would have been obvious and desirable to have used the mixed graphical and textual content teachings of Chan to have enhanced Tso to have been able to have presented fonts to a client which is not configured to display the fonts as is taught by Chan in col. 6 lines 15-35.

**Regarding dependent claim 2,** Tso teaches wherein the language table storage generates translated skeleton content elements using dynamic natural language translation in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. Tso dynamically transcodes skeleton content elements identified by the parser from one natural language to another according to the embodiment described in col. 8 lines 41-50 thus implementing dynamic natural language translation.

**Regarding dependent claim 3,** Tso teaches wherein the client and user determining circuit determines at least one of a client identification and a user identification based on at least one of internet protocol address information, session identifier information, name pairs/value pairs and attribute/value pairs in col. 8 lines 41-45.

**Regarding dependent claim 4,** Tso teaches wherein the merged content portions are stored using at least one of an electronic medium; a printed medium and a paper medium in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The merged content portions of Tso are stored as a web page, which can also be printed out by the client.

**Regarding dependent claim 5,** Tso teaches wherein the merged content portions are at least one of an interactive electronic text, a printed text, an audio book, and a video book in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The merged content portions of Tso are stored as a web page, which can also be printed out by the client.

**Regarding independent claim 6,** Tso teaches receiving a content portion from a client in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. Tso teaches determining at least one of a client and a user associated with the content portion in col. 8 lines 41-45. Tso teaches determining at least one skeleton content elements of the received content portion in fig. 3, col. 3

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line 31 – col. 4 line 37, and col. 8 lines 41-50. The parser determines which elements need to be dynamically transcoded. Tso teaches determining at least one translated skeleton content elements from a language table based on the determined at least one client and user in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The parser identifies content elements requiring transcoding. Tso teaches in col. 8 lines 41-50 that the elements may be dynamically transcoded from one language to client or user's preferred language. The translation of the elements must be performed by some form of table to match the foreign language elements to the corresponding native language text elements. Tso teaches merging the at least one translated skeleton content elements into the content portion in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The parser identifies which content elements need to be dynamically transcoded and replaces the identified content elements with the appropriate translation. Content elements which do not require a translation, such as a graphic element, are maintained by the parser and recombined with the translated elements forming a merging of the translation into the content portion.

Tso does not teach wherein the at least one skeleton content elements include graphical content elements and textual content elements. Chan does teach a server maintaining both graphical content and textual content elements in col. 3 lines 36-45. The font server of Chan maintains both a bit-mapped and outline version of each character which respectively are graphic and text content versions. Chan teaches in fig. 3 and col. 4 lines 10-29 that a graphic glyph is transmitted to client computer for font characters which the client computer cannot display. Chan teaches in col. 6 lines 15-35 that Chan is well suited for displaying fonts of languages other than those for which a particular computer is configured. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Tso and Chan to



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have created the claimed invention. It would have been obvious and desirable to have used the mixed graphical and textual content teachings of Chan to have enhanced Tso to have been able to have presented fonts to a client which is not configured to display the fonts as is taught by Chan in col. 6 lines 15-35.

**Regarding dependent claim 7**, Tso teaches wherein the translated skeleton content elements are determined using at least one of dynamic natural language translation and language table look up in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. Tso dynamically transcodes skeleton content elements identified by the parser from one natural language to another according to the embodiment described in col. 8 lines 41-50 thus implementing dynamic natural language translation. The parser identifies content elements requiring transcoding. Tso teaches in col. 8 lines 41-50 that the elements may be dynamically transcoded from one language to client or user's preferred language. The translation of the elements must be performed by some form of table to match the foreign language elements to the corresponding native language text elements.

**Regarding dependent claim 8**, Tso teaches wherein the client and user is determined based on at least one of internet protocol address information, session identifier information, name pairs and value pairs in col. 8 lines 41-45.

**Regarding dependent claim 9**, Tso teaches wherein determining the merged content portions produces at least one of an interactive text, a printed text, an audio book and a video book in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The merged content portions of Tso are stored as a web page, which can also be printed out by the client.

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**Regarding dependent claim 10**, Tso teaches wherein the merged content portions are stored on at least one of an interactive text, a printed text, an audio book and a video book in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The merged content portions of Tso are stored as a web page, which can also be printed out by the client.

**Regarding independent claim 11**, Tso teaches receiving a content portion from a client in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. Tso teaches determining at least one of a client and a user associated with the content portion in col. 8 lines 41-45. Tso teaches determining at least one skeleton content elements of the received content portion in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The parser determines which elements need to be dynamically transcoded. Tso teaches determining at least one translated skeleton content elements from a language table based on the determined at least one client and user in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The parser identifies content elements requiring transcoding. Tso teaches in col. 8 lines 41-50 that the elements may be dynamically transcoded from one language to client or user's preferred language. The translation of the elements must be performed by some form of table to match the foreign language elements to the corresponding native language text elements. Tso teaches merging the at least one translated skeleton content elements into the content portion in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The parser identifies which content elements need to be dynamically transcoded and replaces the identified content elements with the appropriate translation. Content elements which do not require a translation, such as a graphic element, are maintained by the parser and recombined with the translated elements forming a merging of the translation into the content portion.

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Tso does not teach wherein the at least one skeleton content elements include graphical content elements and textual content elements. Chan does teach a server maintaining both graphical content and textual content elements in col. 3 lines 36-45. The font server of Chan maintains both a bit-mapped and outline version of each character which respectively are graphic and text content versions. Chan teaches in fig. 3 and col. 4 lines 10-29 that a graphic glyph is transmitted to client computer for font characters which the client computer cannot display. Chan teaches in col. 6 lines 15-35 that Chan is well suited for displaying fonts of languages other than those for which a particular computer is configured. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Tso and Chan to have created the claimed invention. It would have been obvious and desirable to have used the mixed graphical and textual content teachings of Chan to have enhanced Tso to have been able to have presented fonts to a client which is not configured to display the fonts as is taught by Chan in col. 6 lines 15-35.

**Regarding dependent claim 12,** Tso teaches wherein the translated skeleton content elements are determined using at least one of dynamic natural language translation and language table look up in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. Tso dynamically transcodes skeleton content elements identified by the parser from one natural language to another according to the embodiment described in col. 8 lines 41-50 thus implementing dynamic natural language translation. The parser identifies content elements requiring transcoding. Tso teaches in col. 8 lines 41-50 that the elements may be dynamically transcoded from one language to client or user's preferred language. The translation of the elements must be performed by

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some form of table to match the foreign language elements to the corresponding native language text elements.

**Regarding dependent claim 13**, Tso teaches wherein the client and user is determined based on at least one of internet protocol address information, session identifier information, name pairs and value pairs in col. 8 lines 41-45.

**Regarding dependent claim 14**, Tso teaches wherein determining the merged content portions produces at least one of an interactive text, a printed text, an audio book and a video book in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The merged content portions of Tso are stored as a web page, which can also be printed out by the client.

**Regarding dependent claim 15**, Tso teaches wherein the merged content portions are stored on at least one of an interactive text, a printed text, an audio book and a video book in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The merged content portions of Tso are stored as a web page, which can also be printed out by the client.

**Regarding independent claim 16**, Tso teaches a client language storage for storing language information associated with a client and a user in col. 8 lines 41-45. Tso teaches a skeleton determining circuit for determining at least one skeleton content elements of a received content portion in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The parser determines which elements need to be dynamically transcoded. Tso teaches a language storage table for storing at least one translation of each of at least one skeleton content elements based on the skeleton content element and a language in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The parser identifies content elements requiring transcoding. Tso teaches in col. 8 lines 41-50 that the elements may be dynamically transcoded from one language to client or

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user's preferred language. The translation of the elements must be performed by some form of table to match the foreign language elements to the corresponding native language text elements. Tso teaches a client and user determining circuit for determining a client and a user associated with a content portion in col. 8 lines 41-45. Tso teaches a language determining circuit for determining the language associated with the client and user in col. 8 lines 41-50. Tso teaches two example methods of determining the client and user's language either through the use of preferences or the client's physical location. Tso teaches a merging circuit for merging at least one skeleton content elements based on the language associated with the determined client into the received content portion in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The parser identifies which content elements need to be dynamically transcoded and replaces the identified content elements with the appropriate translation. Content elements which do not require a translation, such as a graphic element, are maintained by the parser and recombined with the translated elements forming a merging of the translation into the content portion.

Tso does not teach wherein the at least one skeleton content elements include graphical content elements and textual content elements. Chan does teach a server maintaining both graphical content and textual content elements in col. 3 lines 36-45. The font server of Chan maintains both a bit-mapped and outline version of each character which respectively are graphic and text content versions. Chan teaches in fig. 3 and col. 4 lines 10-29 that a graphic glyph is transmitted to client computer for font characters which the client computer cannot display. Chan teaches in col. 6 lines 15-35 that Chan is well suited for displaying fonts of languages other than those for which a particular computer is configured. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Tso and Chan to

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have created the claimed invention. It would have been obvious and desirable to have used the mixed graphical and textual content teachings of Chan to have enhanced Tso to have been able to have presented fonts to a client which is not configured to display the fonts as is taught by Chan in col. 6 lines 15-35.

**Regarding dependent claim 17**, Tso teaches wherein the language table storage generates translated skeleton content elements using dynamic natural language translation in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. Tso dynamically transcodes skeleton content elements identified by the parser from one natural language to another according to the embodiment described in col. 8 lines 41-50 thus implementing dynamic natural language translation.

**Regarding dependent claim 18**, Tso teaches wherein the client and user determining circuit determines the client and user identifier based on at least one of internet protocol address information, session identifier information and name and value pairs in col. 8 lines 41-45.

**Regarding dependent claim 19**, Tso teaches wherein the merged content portions are stored using at least one of an electronic media; a printed media and a paper media in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The merged content portions of Tso are stored as a web page, which can also be printed out by the client.

**Regarding dependent claim 20**, Tso teaches wherein the merged content portions are at least one of an interactive electronic text, a printed text, an audio book, and a video book in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The merged content portions of Tso are stored as a web page, which can also be printed out by the client.

**Regarding independent claim 21,** Tso teaches carrier wave encoded to transmit a control program usable for managing dynamic translation to a device for executing the control program. Tso teaches receiving a content portion from a client in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. Tso teaches determining at least one of a client and a user associated with the content portion in col. 8 lines 41-45. Tso teaches determining at least one skeleton content elements of the received content portion in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The parser determines which elements need to be dynamically transcoded. Tso teaches determining at least one translated skeleton content elements from a language table based on the determined at least one client and user in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The parser identifies content elements requiring transcoding. Tso teaches in col. 8 lines 41-50 that the elements may be dynamically transcoded from one language to client or user's preferred language. The translation of the elements must be performed by some form of table to match the foreign language elements to the corresponding native language text elements. Tso teaches merging the at least one translated skeleton content elements into the content portion in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50. The parser identifies which content elements need to be dynamically transcoded and replaces the identified content elements with the appropriate translation. Content elements which do not require a translation, such as a graphic element, are maintained by the parser and recombined with the translated elements forming a merging of the translation into the content portion. Tso also teaches transmitting the merged at least one translated skeleton content elements and the content portion to the device in fig. 3, col. 3 line 31 – col. 4 line 37, and col. 8 lines 41-50.

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Tso does not teach wherein the at least one skeleton content elements include graphical content elements and textual content elements. Chan does teach a server maintaining both graphical content and textual content elements in col. 3 lines 36-45. The font server of Chan maintains both a bit-mapped and outline version of each character which respectively are graphic and text content versions. Chan teaches in fig. 3 and col. 4 lines 10-29 that a graphic glyph is transmitted to client computer for font characters which the client computer cannot display. Chan teaches in col. 6 lines 15-35 that Chan is well suited for displaying fonts of languages other than those for which a particular computer is configured. It would have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Tso and Chan to have created the claimed invention. It would have been obvious and desirable to have used the mixed graphical and textual content teachings of Chan to have enhanced Tso to have been able to have presented fonts to a client which is not configured to display the fonts as is taught by Chan in col. 6 lines 15-35.

***(11) Response to Argument***

Regarding Appellant's argument that Claim 21 satisfies 35 U.S.C. §101, the Examiner agrees. The Amendment After-Final Rejection filed 3/4/2005 entered upon appeal by the Examiner on 3/17/2005 amends claim 21 such that it is statutory under 35 U.S.C. §101.

Appellant's arguments filed 6/6/2005 regarding the rejections of claims 1-21 under 35 U.S.C. §103 have been fully considered but they are not persuasive.



**Claims 1-5**

Regarding Appellant's argument on pages 10-15 that Tso and Chan do not teach the limitations of independent claim 1, the Examiner respectfully disagrees. Tso teaches in col. 2 lines 44-49 that it can transcode information between a network server and a network client, wherein the term "transcode" applies to virtually any manipulation of data including, but not limited to, adding, modifying, or deleting data. Tso teaches in col. 7 line 44 and col. 8 lines 41-50 that a particular kind of transcoding implemented by the invention is dynamic language translation. Thus, Tso teaches the replacement of language content with corresponding content of an alternate language. Since Tso specifically teaches dynamic translation of language content, the Examiner believes Tso teaches the claimed language table storage. The Examiner believes a reasonable interpretation of a table is an orderly arrangement of data. In light of this reasonable interpretation, a language table for translation purposes is necessary to match each original language content element with a corresponding translated language content element. Thus, the Examiner believes Tso necessarily teaches a language table storage to implement the dynamic language translation described in col. 8 lines 41-50.

The Examiner can imagine, within Tso's definition of transcoding, that a language content could be conditionally replaced with a graphic content or a textual content. However, Tso does not specifically provide an example of such a modification, so the Examiner admits that Tso does not explicitly teach that the skeleton content elements include graphical content elements and textual content elements. The Examiner believes this teaching is, however, specifically taught in Chan. Chan maintains both graphical and text forms of characters at a server as shown in fig. 2 and conditionally provides the appropriate graphical or text character

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(or a set of characters) upon request from the client computer, also shown in fig. 2 and further described in col. 4 line 10 – col. 5 line 6. Chan provides a description in col. 3 lines 30-45 of two example formats of bitmap and outline. It is the Examiner's position that the bitmap character form taught by Chan is a graphic image form of a character. In col. 3 lines 38-40 Chan states that in the bitmap form, the value of each pixel in a block of pixels is specified, to define a rasterized image. This description, to the Examiner, is the claimed graphical content element. It is also the Examiner's position that the outline form taught by Chan is a text form of a character. In col. 3 lines 41 and 42 Chan states that in outline form, the shape of the character is defined by certain points on its periphery. This description, to the Examiner, is the claimed textual content element. Thus, Chan provides the teaching of a server which can provide a client with either a graphical content representation or textual content representation of a character or set of characters as is needed by a client computer.

The Examiner believes a combination of teachings of Tso and Chan would have rendered the claimed invention obvious by one of ordinary skill in the art at the time of the invention. The Examiner would like to make it clear that the dynamic translation and content replacement teachings are entirely taught by Tso. Chan provides the additional teaching that enables Tso to replace a language content with a translation that is composed of either a graphical content or a textual content as is required by the client computer. Thus, the combination of Tso and Chan would have performed language transcoding as taught according to Tso, but would have provided graphical or textual characters as the replacement content according to Chan and therefore in combination teach all the limitations of the invention as presented in independent claim 1.

Regarding Appellant's argument that the combination of Tso and Chan is improper with respect to independent claim 1, the Examiner respectfully disagrees. Both Tso and Chan are inventions implemented in a server and client system wherein the server provides a content service for the client. The server in Tso dynamically transcodes document content before transmitting the document to the client computer. In the specific embodiment relevant to Appellant's claimed invention, the server in Tso dynamically translates the language content elements of a document before transmitting the document to the client computer. The server in Chan provides a client computer with an appropriate graphic or textual character resource so that the client computer can then display the character appropriately. Thus, the Examiner believes the teachings of Tso and Chan are related and would have both been known to one of ordinary skill in the art at the time of the invention. The combination of the teachings would have used the dynamic translation as taught by Tso, but would have used the graphical and textual content elements taught by Chan as the replacement elements. Since Tso teaches in col. 2 lines 44-49 that transcoding includes at least adding, modifying, or deleting data and teaches in col. 8 lines 41-50 that dynamic language translation transcoding may be implemented by replacing original language content elements with a client user's native language content elements, the Examiner believes Chan simply provides the teachings for specific types of transcoding for Tso to perform. Specifically, the teachings of Chan, when combined into Tso, would have enabled a dynamic language translation which would have translated original language content elements into either corresponding translated graphical content elements or corresponding translated textual content elements. Thus, the Examiner maintains the assertion that the combination of Tso and Chan is valid.

The Examiner maintains that the motivation to combine the teachings of Tso and Chan is proper. Chan teaches in col. 4 lines 10-29 that a server provides a graphical or textual character content to a client computer when the client computer is unable to display the character contained in the document. Since Tso specifically teaches a transcoding server which dynamically translates a document from an original language to a translated language, it is a risk that the translation might produce characters which the client computer may not be able to display. Thus, the Examiner maintains that the teachings of Chan significantly improve the dynamic translation taught by Tso by providing necessary graphical or textual content elements to the client computer for elements that the client computer cannot otherwise display. Thus, the Examiner maintains that the motivation to combine the teachings of Tso and Chan is properly derived from the cited prior art.

It is for at least these reasons set forth by the Examiner that the combination of Tso and Chan is proper and, when combined by one of ordinary skill in the art at the time of the invention, renders obvious the invention as presented in independent claim 1 and dependent claims 2-5.

#### **Claims 6-10**

Regarding Appellant's argument on pages 15-20 that Tso and Chan do not teach the limitations of independent claim 6, the Examiner respectfully disagrees. Tso teaches in col. 2 lines 44-49 that it can transcode information between a network server and a network client, wherein the term "transcode" applies to virtually any manipulation of data including, but not limited to, adding, modifying, or deleting data. Tso teaches in col. 7 line 44 and col. 8 lines 41-

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50 that a particular kind of transcoding implemented by the invention is dynamic language translation. Thus, Tso teaches the replacement of language content with corresponding content of an alternate language. Since Tso specifically teaches dynamic translation of language content, the Examiner believes Tso teaches the claimed language table storage. The Examiner believes a reasonable interpretation of a table is an orderly arrangement of data. In light of this reasonable interpretation, a language table for translation purposes is necessary to match each original language content element with a corresponding translated language content element. Thus, the Examiner believes Tso necessarily teaches a language table storage to implement the dynamic language translation described in col. 8 lines 41-50.

The Examiner can imagine, within Tso's definition of transcoding, that a language content could be conditionally replaced with a graphic content or a textual content. However, Tso does not specifically provide an example of such a modification, so the Examiner admits that Tso does not explicitly teach that the skeleton content elements include graphical content elements and textual content elements. The Examiner believes this teaching is, however, specifically taught in Chan. Chan maintains both graphical and text forms of characters at a server as shown in fig. 2 and conditionally provides the appropriate graphical or text character (or a set of characters) upon request from the client computer, also shown in fig. 2 and further described in col. 4 line 10 – col. 5 line 6. Chan provides a description in col. 3 lines 30-45 of two example formats of bitmap and outline. It is the Examiner's position that the bitmap character form taught by Chan is a graphic image form of a character. In col. 3 lines 38-40 Chan states that in the bitmap form, the value of each pixel in a block of pixels is specified, to define a rasterized image. This description, to the Examiner, is the claimed graphical content element. It

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is also the Examiner's position that the outline form taught by Chan is a text form of a character. In col. 3 lines 41 and 42 Chan states that in outline form, the shape of the character is defined by certain points on its periphery. This description, to the Examiner, is the claimed textual content element. Thus, Chan provides the teaching of a server which can provide a client with either a graphical content representation or textual content representation of a character or set of characters as is needed by a client computer.

The Examiner believes a combination of teachings of Tso and Chan would have rendered the claimed invention obvious by one of ordinary skill in the art at the time of the invention. The Examiner would like to make it clear that the dynamic translation and content replacement teachings are entirely taught by Tso. Chan provides the additional teaching that enables Tso to replace a language content with a translation that is composed of either a graphical content or a textual content as is required by the client computer. Thus, the combination of Tso and Chan would have performed language transcoding as taught according to Tso, but would have provided graphical or textual characters as the replacement content according to Chan and therefore in combination teach all the limitations of the invention as presented in independent claim 1.

Regarding Appellant's argument that the combination of Tso and Chan is improper with respect to independent claim 6, the Examiner respectfully disagrees. Both Tso and Chan are inventions implemented in a server and client system wherein the server provides a content service for the client. The server in Tso dynamically transcodes document content before transmitting the document to the client computer. In the specific embodiment relevant to Appellant's claimed invention, the server in Tso dynamically translates the language content

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elements of a document before transmitting the document to the client computer. The server in Chan provides a client computer with an appropriate graphic or textual character resource so that the client computer can then display the character appropriately. Thus, the Examiner believes the teachings of Tso and Chan are related and would have both been known to one of ordinary skill in the art at the time of the invention. The combination of the teachings would have used the dynamic translation as taught by Tso, but would have used the graphical and textual content elements taught by Chan as the replacement elements. Since Tso teaches in col. 2 lines 44-49 that transcoding includes at least adding, modifying, or deleting data and teaches in col. 8 lines 41-50 that dynamic language translation transcoding may be implemented by replacing original language content elements with a client user's native language content elements, the Examiner believes Chan simply provides the teachings for specific types of transcoding for Tso to perform. Specifically, the teachings of Chan, when combined into Tso, would have enabled a dynamic language translation which would have translated original language content elements into either corresponding translated graphical content elements or corresponding translated textual content elements. Thus, the Examiner maintains the assertion that the combination of Tso and Chan is valid.

The Examiner maintains that the motivation to combine the teachings of Tso and Chan is proper. Chan teaches in col. 4 lines 10-29 that a server provides a graphical or textual character content to a client computer when the client computer is unable to display the character contained in the document. Since Tso specifically teaches a transcoding server which dynamically translates a document from an original language to a translated language, it is a risk that the translation might produce characters which the client computer may not be able to



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display. Thus, the Examiner maintains that the teachings of Chan significantly improve the dynamic translation taught by Tso by providing necessary graphical or textual content elements to the client computer for elements that the client computer cannot otherwise display. Thus, the Examiner maintains that the motivation to combine the teachings of Tso and Chan is properly derived from the cited prior art.

It is for at least these reasons set forth by the Examiner that the combination of Tso and Chan is proper and, when combined by one of ordinary skill in the art at the time of the invention, renders obvious the invention as presented in independent claim 6 and dependent claims 7-10.

#### **Claims 11-15**

Regarding Appellant's argument on pages 20 and 21 that Tso and Chan do not teach the limitations of independent claim 11, the Examiner respectfully disagrees. Because the invention of claim 11 is a computer readable storage medium that includes a computer readable program code that is configured to perform the method for managing the dynamic translation of claim 6 and includes all the features of claim 6, the Examiner maintains the rejection of claim 11 and its dependent claims 12-15 for the same reasons stated above with respect to claim 6.

#### **Claims 16-20**

Regarding Appellant's argument on pages 21-25 that Tso and Chan do not teach the limitations of independent claim 16, the Examiner respectfully disagrees. Tso teaches in col. 2 lines 44-49 that it can transcode information between a network server and a network client,



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wherein the term “transcode” applies to virtually any manipulation of data including, but not limited to, adding, modifying, or deleting data. Tso teaches in col. 7 line 44 and col. 8 lines 41-50 that a particular kind of transcoding implemented by the invention is dynamic language translation. Thus, Tso teaches the replacement of language content with corresponding content of an alternate language. Since Tso specifically teaches dynamic translation of language content, the Examiner believes Tso teaches the claimed language table storage. The Examiner believes a reasonable interpretation of a table is an orderly arrangement of data. In light of this reasonable interpretation, a language table for translation purposes is necessary to match each original language content element with a corresponding translated language content element. Thus, the Examiner believes Tso necessarily teaches a language table storage to implement the dynamic language translation described in col. 8 lines 41-50.

The Examiner can imagine, within Tso’s definition of transcoding, that a language content could be conditionally replaced with a graphic content or a textual content. However, Tso does not specifically provide an example of such a modification, so the Examiner admits that Tso does not explicitly teach that the skeleton content elements include graphical content elements and textual content elements. The Examiner believes this teaching is, however, specifically taught in Chan. Chan maintains both graphical and text forms of characters at a server as shown in fig. 2 and conditionally provides the appropriate graphical or text character (or a set of characters) upon request from the client computer, also shown in fig. 2 and further described in col. 4 line 10 – col. 5 line 6. Chan provides a description in col. 3 lines 30-45 of two example formats of bitmap and outline. It is the Examiner’s position that the bitmap character form taught by Chan is a graphic image form of a character. In col. 3 lines 38-40 Chan

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states that in the bitmap form, the value of each pixel in a block of pixels is specified, to define a rasterized image. This description, to the Examiner, is the claimed graphical content element. It is also the Examiner's position that the outline form taught by Chan is a text form of a character. In col. 3 lines 41 and 42 Chan states that in outline form, the shape of the character is defined by certain points on its periphery. This description, to the Examiner, is the claimed textual content element. Thus, Chan provides the teaching of a server which can provide a client with either a graphical content representation or textual content representation of a character or set of characters as is needed by a client computer.

The Examiner believes a combination of teachings of Tso and Chan would have rendered the claimed invention obvious by one of ordinary skill in the art at the time of the invention. The Examiner would like to make it clear that the dynamic translation and content replacement teachings are entirely taught by Tso. Chan provides the additional teaching that enables Tso to replace a language content with a translation that is composed of either a graphical content or a textual content as is required by the client computer. Thus, the combination of Tso and Chan would have performed language transcoding as taught according to Tso, but would have provided graphical or textual characters as the replacement content according to Chan and therefore in combination teach all the limitations of the invention as presented in independent claim 1.

Regarding Appellant's argument that the combination of Tso and Chan is improper with respect to independent claim 16, the Examiner respectfully disagrees. Both Tso and Chan are inventions implemented in a server and client system wherein the server provides a content service for the client. The server in Tso dynamically transcodes document content before

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transmitting the document to the client computer. In the specific embodiment relevant to Appellant's claimed invention, the server in Tso dynamically translates the language content elements of a document before transmitting the document to the client computer. The server in Chan provides a client computer with an appropriate graphic or textual character resource so that the client computer can then display the character appropriately. Thus, the Examiner believes the teachings of Tso and Chan are related and would have both been known to one of ordinary skill in the art at the time of the invention. The combination of the teachings would have used the dynamic translation as taught by Tso, but would have used the graphical and textual content elements taught by Chan as the replacement elements. Since Tso teaches in col. 2 lines 44-49 that transcoding includes at least adding, modifying, or deleting data and teaches in col. 8 lines 41-50 that dynamic language translation transcoding may be implemented by replacing original language content elements with a client user's native language content elements, the Examiner believes Chan simply provides the teachings for specific types of transcoding for Tso to perform. Specifically, the teachings of Chan, when combined into Tso, would have enabled a dynamic language translation which would have translated original language content elements into either corresponding translated graphical content elements or corresponding translated textual content elements. Thus, the Examiner maintains the assertion that the combination of Tso and Chan is valid.

The Examiner maintains that the motivation to combine the teachings of Tso and Chan is proper. Chan teaches in col. 4 lines 10-29 that a server provides a graphical or textual character content to a client computer when the client computer is unable to display the character contained in the document. Since Tso specifically teaches a transcoding server which

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dynamically translates a document from an original language to a translated language, it is a risk that the translation might produce characters which the client computer may not be able to display. Thus, the Examiner maintains that the teachings of Chan significantly improve the dynamic translation taught by Tso by providing necessary graphical or textual content elements to the client computer for elements that the client computer cannot otherwise display. Thus, the Examiner maintains that the motivation to combine the teachings of Tso and Chan is properly derived from the cited prior art.

It is for at least these reasons set forth by the Examiner that the combination of Tso and Chan is proper and, when combined by one of ordinary skill in the art at the time of the invention, renders obvious the invention as presented in independent claim 16 and dependent claims 17-20.

#### **Claim 21**

Regarding Appellant's argument on pages 26 that Tso and Chan do not teach the limitations of independent claim 21, the Examiner respectfully disagrees. Because the invention of claim 21 is directed to a program stored on a computer-readable medium that includes instructions for executing the program to perform the method for managing the dynamic translation of claim 6 and includes all the features of claims 6, the Examiner maintains the rejection of claim 21 for the same reasons stated above with respect to claim 6.

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For the above reasons, it is believed that the rejections should be sustained.

Respectfully submitted,

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August 10, 2005

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